



FAA-2001-11032

January 30, 2002

EXPRESS MAIL

Ms. Jane F. Garvey, Administrator  
Docket Management System  
**U.S. Department of Transportation**  
400 Seventh Street, S.W.  
Washington, DC 20590-0001

Re: Docket No. FAA-2001-11032 & SFAR 92-3  
Comments and Request for Exemption

Dear Ms. Garvey:

In reference to your recent communication relative to your Departments' Special FAR No. 92-3, pertaining to Flightdeck Compartment Access and Door Designs, which purports to require all cargo airplanes that have cockpit doors installed to have internal locking devices installed on such doors within 45 days of publication of the above revision, please be advised that Zantop is taking immediate actions to install the internal locking device. With regard to the modification of the Cockpit Door, we are requesting an exemption.

Zantop International Airlines, Inc. is, and has since 1972, operated only as an all-cargo airline under Part 121. During such operations, Zantop's transportation of persons other than active flight-crew personnel has been limited for the most part to FAA Inspectors and Zantop's own employees, such as licensed airmen, mechanics and loadmasters. Only on rare occasions have we ever transported other pre-approved, authorized personnel as allowed under Sec. 121.583 and 121.547.

Zantop's present flight operations are limited to the operation of its fleet of 13 Lockheed L-188 Electra Aircraft, all of which are in cargo configurations. In addition, nine of such aircraft have had the cockpit doors removed, as part of the STC modifying the aircraft to cargo, since the dates of modification or acquisition by Zantop. Only four aircraft presently have the original cockpit doors installed.

Your Department has decided to include all cargo aircraft as subject to SFAR-92-3. We feel that Zantop's operations are vastly different from other cargo carriers, such as



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FedEx, in that Zantop's transportation of non-flight personnel is much more restricted, as above set forth, as well as being limited to between 2-3 available courier seats on each aircraft.

On nine of the aircraft owned by Zantop, the two courier seats are located forward of the door separating the cockpit from the cargo compartment. On the remaining four aircraft owned by Zantop, there is a cockpit door between the cockpit and courier seating area. In all of the aircraft, the emergency exit for couriers is through the side cockpit windows. In the case of the remaining four aircraft, namely N5507, 5510L, 5512 and 5522, the reinforced and locked cockpit door would prevent any escape. Attached is a diagram and chart of the cockpit and the courier-seating arrangement, for your reference.

Zantop is always desirous of taking all reasonable safety and security measures to guard against intrusion of unauthorized personnel on its aircraft, and is currently in the process of installing internal locking devices on all existing doors. We feel, however, that imposing the requirements applicable to passenger-carrying airlines, the installation of reinforced cockpit doors constitutes an unreasonable financial burden upon our small cargo airline, which is part of an industry struggling for survival. We also feel that the safety desired can be assured by clarifying who is authorized to be on board and occupying the courier seats, with additional restrictions if necessary.

Accordingly, we respectfully request that our company's existing aircraft be exempted from the provisions of SFAR-92-3 as relates to further cockpit door modifications. If you have any questions or require additional information or documentation relative to the above matter, please contact us at your earliest convenience.

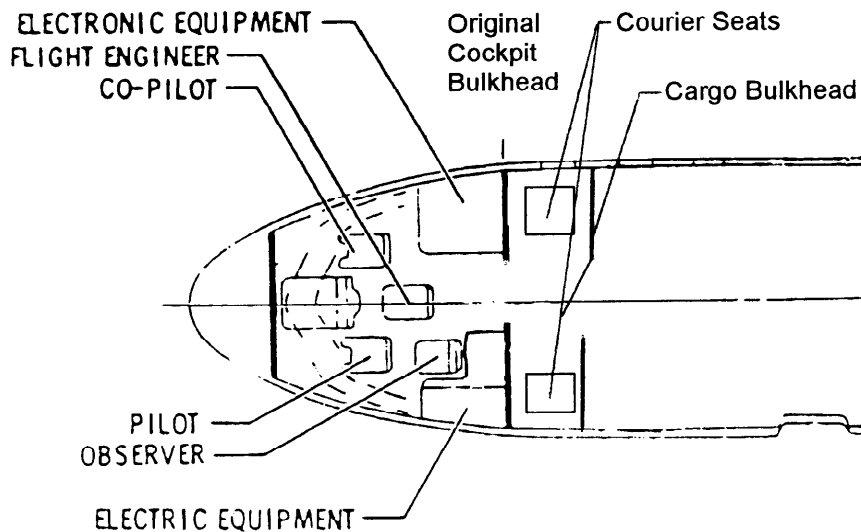
Sincerely,

A handwritten signature in cursive script that reads "James M. Zantop".

James M. Zantop  
President

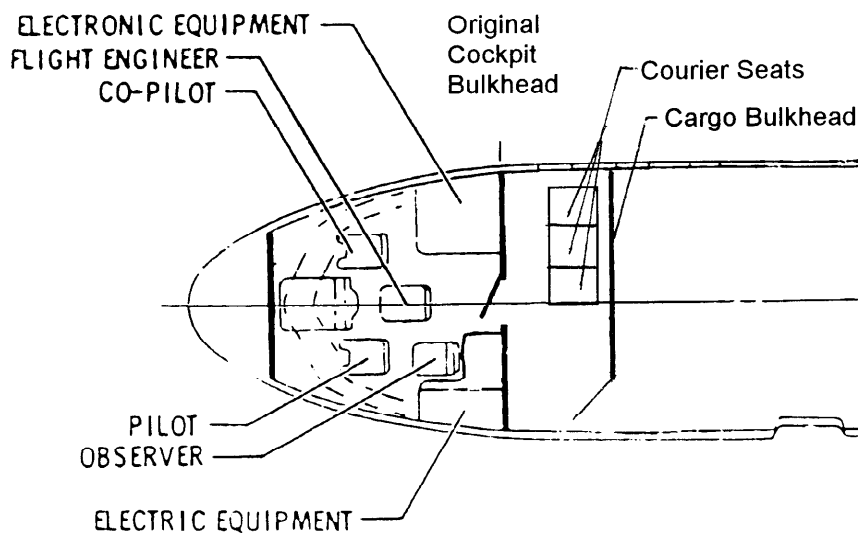
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Attachment



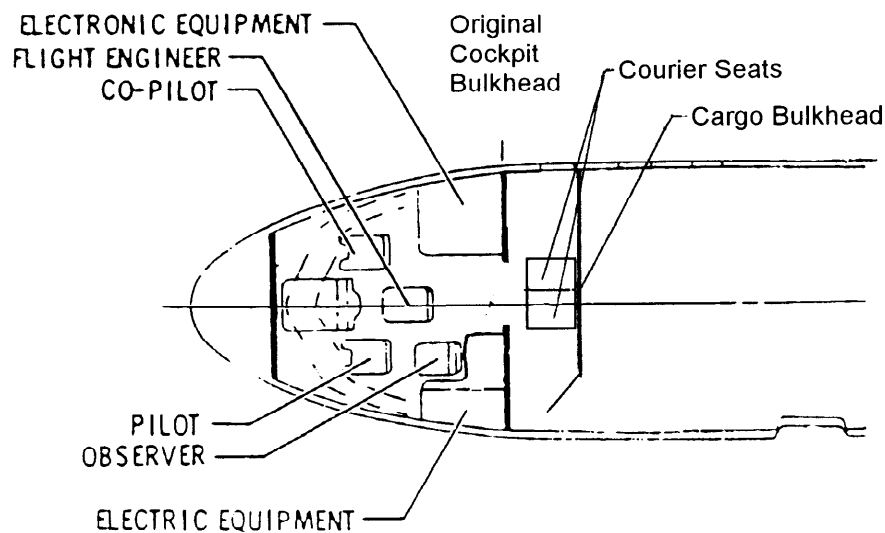
Seat layout of aircraft with 2 jump seats, a Cargo Bulkhead w/door and no door entering the Cockpit.

N282F  
N284F  
N286F  
N290F



Seat layout of aircraft with 3 jump seats, a Cargo Bulkhead w/door and a door entering the Cockpit.

N5507  
N5510L  
N5512  
N5522



Seat layout of aircraft with 2 jump seats, a Cargo Bulkhead w/door and no door entering the Cockpit.

N340HA  
N341HA  
N343HA  
N344HA  
N346HA

# **ZANTOP** INTERNATIONAL AIRLINES, INC.

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## **INTER-OFFICE MEMO**

**TO:** James Loree

**FROM:** Kevin A. Love

**DATE:** January 23, 2002

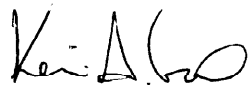
**SUBJECT:** Cockpit doors and SFAR 92-3

*Below is a listing of how the aircraft are configured for cockpit and Cargo Bulkhead doors:*

<b>"N" Number</b>	<b>S/N</b>	<b># of Seats</b>	<b>Cockpit Door</b>	<b>Cargo Bulkhead Door</b>
N282F	1084	2	REMOVED	INSTALLED
N284F	1104	2	REMOVED	INSTALLED
N286F	1146	2	REMOVED	INSTALLED
N290F	1133	2	REMOVED	INSTALLED
N5507	1012	3	INSTALLED	INSTALLED
N5510L	1014	3	INSTALLED	INSTALLED
N5512	1017	3	INSTALLED	INSTALLED
N5522	1033	3	INSTALLED	INSTALLED
N340HA	1109	2	REMOVED	INSTALLED
N341HA	1035	2	REMOVED	INSTALLED
N343HA	1053	2	REMOVED	INSTALLED
N344HA	1038	2	REMOVED	INSTALLED
N346HA	1043	2	REMOVED	INSTALLED

*Note: A/C with Cockpit Door removed – The Courier seating is considered part of the Cockpit.*

*Thank you,*



*Kevin A. Love*

*Director of Quality Control*